

FREJKA PLLC
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Attorneys for Estate of Robert Rimsky, Rimsky Family Limited Partnership, L. Rimsky, Inc., Article Third Trust U/W Jeanne Rimsky, Article Fourth Trust Section One, Article Fourth Trust Section Three, Article Fifth Trust Section One, Douglas Jay Rimsky, Rena Rimsky Wing, Lee Cooper Rimsky, Don Harris Rimsky, Renee Rimsky, Margaret Rimsky, Sarah Rimsky Levitin, Kenneth Wing, Gabrielle Jaffe, Adam Beer, Jonathan Wing, Juliette Beer, Barry Meyers, Harriet L. Meyers, Eric Rimsky, Liza Rimsky, Kate Rimsky, K.A.L., A.R.L., J.L.W., and T. Randolph Harris, in his Fiduciary Capacity as Trustee for The Article Third Trust U/W Jeanne Rimsky

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ROBERT RIMSKY, RIMSKY
FAMILY LIMITED PARTNERSHIP, L. RIMSKY,
INC., ARTICLE THIRD TRUST U/W JEANNE
RIMSKY, ARTICLE FOURTH TRUST SECTION
ONE, ARTICLE FOURTH TRUST SECTION
THREE, ARTICLE FIFTH TRUST SECTION ONE,
DOUGLAS JAY RIMSKY, RENA RIMSKY WING,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04388 (SMB)

LEE COOPER RIMSKY, DON HARRIS RIMSKY,
RENEE RIMSKY, MARGARET RIMSKY, SARAH
RIMSKY LEVITIN, KENNETH WING,
GABRIELLE JAFFE, ADAM BEER, JONATHAN
WING, JULIETTE BEER, BARRY MEYERS,
HARRIET L. MEYERS, ERIC RIMSKY, LIZA
RIMSKY, KATE RIMSKY, K.A.L., A.R.L., J.L.W.,
and T. RANDOLPH HARRIS, in his fiduciary
capacity as trustee for the ARTICLE THIRD TRUST
U/W JEANNE RIMSKY,

Defendants.

NOTICE OF SUBSTITUTION OF COUNSEL AND PROPOSED ORDER

PLEASE TAKE NOTICE that the law firm of Frejka PLLC, 733 Third Avenue, New York, New York 10017, shall be substituted in place of the law firm of Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 as counsel of record for Estate of Robert Rimsky, Rimsky Family Limited Partnership, L. Rimsky, Inc., Article Third Trust U/W Jeanne Rimsky, Article Fourth Trust Section One, Article Fourth Trust Section Three, Article Fifth Trust Section One, Douglas Jay Rimsky, Rena Rimsky Wing, Lee Cooper Rimsky, Don Harris Rimsky, Renee Rimsky, Margaret Rimsky, Sarah Rimsky Levitin, Kenneth Wing, Gabrielle Jaffe, Adam Beer, Jonathan Wing, Juliette Beer, Barry Meyers, Harriet L. Meyers, Eric Rimsky, Liza Rimsky, Kate Rimsky, K.A.L., A.R.L., J.L.W., and T. Randolph Harris, in his Fiduciary Capacity as Trustee for The Article Third Trust U/W Jeanne Rimsky (the “Defendants”) in this adversary proceeding. All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

FREJKA PLLC
733 Third Avenue
New York, New York 10017
Attn: Elise S. Frejka
Jason S. Rappaport
Telephone: (212) 641-0800

Email: efrejka@frejka.com
jrappaport@frejka.com

PLEASE TAKE FURTHER NOTICE THAT the Defendants have knowledge of and
consent to this substitution of counsel.

Dated: New York, New York
March 20, 2015

Dated: New York, New York
March 20, 2015

KRAMER LEVIN NAFTALIS &
FRANKEL LLP

FREJKA PLLC

By: /s/ Philip Bentley
Philip Bentley
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000

By: /s/ Elise S. Frejka
Elise S. Frejka
Jason S. Rappaport
733 Third Avenue
New York, New York 10017
Telephone: (212) 641-0800

Dated: New York, New York
March __, 2015

SO ORDERED:

HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ROBERT RIMSKY, RIMSKY FAMILY
LIMITED PARTNERSHIP, L. RIMSKY, INC., ARTICLE
THIRD TRUST U/W JEANNE RIMSKY, ARTICLE
FOURTH TRUST SECTION ONE, ARTICLE FOURTH
TRUST SECTION THREE, ARTICLE FIFTH TRUST
SECTION ONE, DOUGLAS JAY RIMSKY, RENA
RIMSKY WING, LEE COOPER RIMSKY, DON
HARRIS RIMSKY, RENEE RIMSKY, MARGARET
RIMSKY, SARAH RIMSKY LEVITIN, KENNETH
WING, GABRIELLE JAFFE, ADAM BEER,
JONATHAN WING, JULIETTE BEER, BARRY
MEYERS, HARRIET L. MEYERS, ERIC RIMSKY,
LIZA RIMSKY, KATE RIMSKY, K.A.L., A.R.L., J.L.W.,
and T. RANDOLPH HARRIS, in his fiduciary capacity as
trustee for the ARTICLE THIRD TRUST U/W JEANNE
RIMSKY,

Defendants.

Adv. Pro. No. 10-04388 (SMB)

DECLARATION OF ELISE S. FREJKA

I, ELISE S. FREJKA declare as follows:

1. I am a member of the firm of Frejka PLLC and a member of the Bar of this Court. Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I submit this declaration in support of the accompanying notice and proposed order substituting Frejka PLLC for Kramer Levin Naftalis & Frankel LLP as counsel for Estate of Robert Rimsky, Rimsky Family Limited Partnership, L. Rimsky, Inc., Article Third Trust U/W Jeanne Rimsky, Article Fourth Trust Section One, Article Fourth Trust Section Three, Article Fifth Trust Section One, Douglas Jay Rimsky, Rena Rimsky Wing, Lee Cooper Rimsky, Don Harris Rimsky, Renee Rimsky, Margaret Rimsky, Sarah Rimsky Levitin, Kenneth Wing, Gabrielle Jaffe, Adam Beer, Jonathan Wing, Juliette Beer, Barry Meyers, Harriet L. Meyers, Eric Rimsky, Liza Rimsky, Kate Rimsky, K.A.L., A.R.L., J.L.W., and T. Randolph Harris, in his Fiduciary Capacity as Trustee for The Article Third Trust U/W Jeanne Rimsky (the “Defendants”) in the above-captioned adversary proceeding. I also have read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendants have requested and consent to this substitution of counsel.

3. It is not expected that any delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 20, 2015

By: /s/ Elise S. Frejka
Elise S. Frejka